

From: "Jackie Joyce" <Jackie.Joyce@state.co.us>
To: (b) (6) >
Subject: Re: Comanche Power Plant
Date: Mon, 07 Mar 2005 07:38:01 -0700

Joan,

I put a copy of the CD with the Comanche Unit 3 revised application in the mail to you this morning. The original application was submitted on August 6, 2004, with a supplement received on September 10, 2004. The revised application was submitted on January 19, 2005 and includes the provisions of the settlement agreement PSCo entered into with various citizen groups. I gave you a copy of the January 19, 2005 application.

I should clarify the permitting status for you. The current Title V permit for Comanche is on our web page. However, the current Title V permit does not address the proposed new Unit 3. PSCo will be getting construction permits for the proposed new Unit. In addition, PSCo will be getting construction permits for any other new equipment associated with the Unit 3 project, as well as construction permits for existing modified equipment. Currently, draft construction permits, as well as the preliminary analysis have been sent to PSCo for a pre-public comment review period. At this time those construction permits and preliminary analysis are considered public and under a FOIA request you could review them. I can e-mail you electronic copies of them or you can come in and look at them. There are 10 permits and the preliminary analysis is somewhat lengthy (about 65 pages).

When the public comment period begins, the draft permits and preliminary analysis will be on our web site for review.

Note that eventually the construction permits issued for the Unit 3 project will be included in the Title V permit, but that is some years down the road. The application to revise the Title V permit is not required until 12 months after Unit 3 commences operation and startup for Unit 3 is not expected until sometime in 2009.

I will send you an e-mail later on your modeling questions. Let me know if you have any questions. my number is 303-692-3267.

ATTACHMENT -4

SANTARELLA & ECKERT, LLC

**7050 PUMA TRAIL
LITTLETON, CO 80125**

**TELEPHONE: 303-932-7610
FACSIMILE: 303-932-7316**

VIA CERTIFIED MAIL/RETURN RECEIPT REQUESTED

March 10, 2005

Corporation Service Company
Registered Agent for Xcel Energy, Inc.
1560 Broadway
Denver, CO 80202

Corporation Service Company
Registered Agent for Public Service Company of Colorado
1560 Broadway
Denver, CO 80202

**Re: Notice of Intent to File Suit Pursuant to Section 304 of the Clean Air Act,
42 U.S.C. § 7604 for alleged PSD Permit Program Violations –
Comanche Station, Pueblo, CO**

Dear Sirs or Madams:

The Rocky Mountain Environmental Labor Coalition ("RMELC"), through counsel, hereby provides formal notice in accordance with section 304(b) of the Clean Air Act ("CAA" or "the Act"), 42 U.S.C. § 7604(b) to Xcel Energy, Inc., and the Public Service Company of Colorado d/b/a Xcel Energy ("PSCo") and relevant federal and state officials of RMELC's intent to commence a civil action against Xcel Energy, Inc., and PSCo pursuant to section 304 of the CAA, 42 U.S.C. § 7604, with regard to Xcel Energy, Inc.'s and PSCo's operation of a coal-fired steam-electric generating station known as Comanche Generating Station ("Comanche Station") located near Pueblo, Colorado. RMELC, with a principal place of business at 404 North Spruce Street, Colorado Springs, Colorado 80905, is a non-profit corporation dedicated to ensuring a balance between rapid population growth, labor interests and the preservation of the natural environment throughout the Rocky Mountain region. RMELC members work, reside and recreate in the Pueblo area and are affected by the Comanche Station operations and the alleged violations set forth herein.

RMELC alleges that Xcel Energy, Inc., and PSCo have violated at various times since at least 1994 to the present and may be in continuing violation at the Comanche Station of section 165(a) of the CAA, 42 U.S.C. § 7475(a), and the underlying federal and state prevention of significant deterioration ("PSD") regulations set forth at 40 C.F.R. Part 52 and the Colorado State Implementation Plan ("SIP") as set forth at Colorado Air Quality Control Commission

("CAQCC") Regulation No. 3, Part D, which make unlawful the construction or major modification of a major emitting facility after August 7, 1977, in an attainment area unless a PSD permit that sets forth emission limitations has been issued for such proposed facility. Xcel Energy, Inc., and PSCo have modified and operated the Comanche Station without obtaining New Source Review ("NSR") PSD permits authorizing the construction and operation of physical modifications of Comanche Station's Unit 1 and 2 as required by the CAA. These violations of the CAA and the SIP of Colorado have resulted in the release of massive unpermitted and, therefore, illegal amounts of air pollutants including, *inter alia*, Sulfur Dioxide ("SO₂"), Nitrogen Oxides ("NO_x") and/or Particulate Matter ("PM") into the environment. Until these violations are corrected, Xcel Energy, Inc., and PSCo may continue to release massive amounts of illegal emissions into the environment.

Pursuant to Part C of Title I of the CAA, the Colorado SIP requires that no construction or operation of a major modification of a major stationary source occur in an area designated as attainment without first obtaining a permit under federal regulations set forth at 40 C.F.R. § 52.21, and prohibits the operation of a major stationary source after a major modification unless the source has applied the Best Available Control Technology ("BACT") pursuant to 40 C.F.R. § 52.21(j) and the Colorado SIP at 5 Code of Colorado Regulations ("CCR")1001-5. The PSD provisions of the Colorado SIP, as implemented by CAQCC Regulation No. 3, require that no emission unit or source subject to PSD shall be constructed without obtaining an air construction permit in compliance with PSD requirements.

As set forth in the Notice of Violation ("NOV") issued by the United States Environmental Protection Agency ("EPA") to Xcel Energy, Inc., on June 27, 2002, (Attachment 1) which is incorporated herein by reference, RMELC asserts that the following physical changes or changes in the method of operation made to Comanche Station's Unit 1 and 2 and related pollution control equipment since at least 1994 have resulted in a significant net emission increase in emissions of SO₂, NO_x, and/or PM from Units 1 and 2 and related pollution control equipment into the atmosphere equal to or in excess of the rate of net emissions increase of said pollutants as set forth at federal regulations at 40 C.F.R. §§ 52.21(b)(3) and (23)(i) and the Colorado SIP Rules at CAQCC Regulation No. 3, Part D, Section II.A.27 and Section II.A.44.

The major modifications at Comanche Station include, *inter alia*, the following physical or operational changes and related pollution control equipment, alone or in combination:

- (1) Reheater redesign and replacement at Comanche Station's Unit 2 was completed in 1994; and
- (2) Replacement and redesign of a reheater and arch wall at Comanche Station's Unit 1 was completed in 2000.

Notice of Intent To File Suit
Registered Agents for Xcel Energy, Inc., and PSCo
3/10/2005
Page 3 of 5

RMELC alleges that these physical changes or changes in method of operation made to Comanche Station's Unit 1 and Unit 2 and related pollution control equipment are major modifications within the meaning of 40 C.F.R. § 52.21(b)(2)(i) and CAQCC Regulation No. 3, Part D, Section II.A.23. Xcel Energy, Inc., and PSCo, therefore, were required to submit a PSD permit application to the Colorado Air Pollution Control Division ("APCD"), obtain a PSD permit from APCD, and comply with other PSD permit program requirements including the application of BACT for each pollutant regulated under the CAA for which there would be a significant net emissions increase at the source **prior** to the major modifications of Comanche Station's Unit 1 and Unit 2 and related pollution control equipment in accordance with section 165 of the CAA, 42 U.S.C. § 7475, federal regulations set forth at 40 C.F.R. § 52.21, and state regulations set forth at CAQCC Regulation No. 3, Part D. RMELC further alleges that Xcel Energy, Inc., and PSCo have violated and may continue to violate these PSD permit requirements applicable to Comanche Station's Unit 1 and Unit 2 and related pollution control equipment.

The CAA and the underlying regulations set forth at 40 C.F.R. Part 54 require 60-day notice of intent to file suit for claims brought pursuant to section 304(a)(1) and (2) of the Act, 42 U.S.C. § 7604(a)(1) and (2), be given to the alleged violator, the Administrator of the EPA, the Regional Administrator of EPA for the Region in which the violations are alleged to have occurred, and an authorized representative of the State Agency charged with responsibility for air pollution control in the State.

However, the 60-day notice requirement set forth at section 304(b)(1) of the Act, 42 U.S.C. § 7604(b)(1), does not apply to actions brought in federal district court pursuant to section 304(a)(3) of the CAA, 42 U.S.C. § 7604(a)(3), against a person who proposes to construct or constructs any new or modified major emitting facility without a PSD permit. See United Steelworkers of America v. Oregon Steel Mills, Inc., 322 F.3d 1222, 1227 (10th Cir. 2003). Accordingly, RMELC is not required to wait 60 days before initiating an action to enforce the PSD permit violations set forth in this Notice Letter and the attached NOV.

This letter constitutes **NOTICE OF INTENT TO SUE** Xcel Energy, Inc., and PSCo by RMELC for alleged violations of the CAA at the Comanche Station as described herein. In RMELC's lawsuit, which may be brought at any time, RMELC intends to seek, *inter alia*, the following relief:

- (1) A declaratory judgment ordering Xcel Energy, Inc., and PSCo to obtain a PSD permit for Comanche Station from APCD for each pollutant regulated under the CAA for which there would be a significant net emissions increase at the source including, *inter alia*, SO₂, NO_x, and PM due to major modifications made to Units 1 and 2 and related pollution control equipment from 1994 until 2000;

Notice of Intent To File Suit
Registered Agents for Xcel Energy, Inc., and PSCo
3/10/2005
Page 4 of 5

- (2) Injunctive relief to ensure compliance with applicable CAA PSD permit program requirements set forth in applicable federal and state regulations with regard to Comanche Station's Unit 1 and Units 2 that have been subject to major modifications; and
- (3) The assessment of appropriate civil penalties for each violation of the PSD requirements alleged herein at Comanche Station pursuant to section 304(g)(1) of the CAA, 42 U.S.C. § 7604(g)(1).

Section 113 of the CAA, 42 U.S.C. § 7413, provides for civil penalties of not more than \$25,000 per day for each violation on or before January 30, 1997. Moreover, in accordance with the Federal Civil Penalties Inflation Adjustment Act of 1990, 28 U.S.C. § 2461, as amended by the Debt Collection Improvement Act of 1996, 31 U.S.C. § 3701, a court may assess \$27,500 per day for each violation after January 30, 1997, through March 15, 2004, and \$32,500 per day for each violation after March 15, 2004, pursuant to 40 C.F.R. § 19.4.

Please do not hesitate to contact me at the telephone number set forth above if you have any questions regarding this notice letter including clarification of the violations alleged herein or are interested in discussing settlement.

Very truly yours,

Joseph M Santarella Jr.
Attorney at Law

Counsel for RMELC

cc: Governor Bill Owens
State of Colorado
136 State Capitol Building
Denver, CO 80203-1792
(Via Certified Mail/Return Receipt Requested)

Mr. Douglas H. Benevento
Executive Director
Colorado Department of Public Health & Environment
4300 Cherry Creek Drive South
Denver, CO 80246-1530

Notice of Intent To File Suit
Registered Agents for Xcel Energy, Inc., and PSCo
3/10/2005
Page 5 of 5

(Via Certified Mail/Return Receipt Requested)

Mr. Robbie Roberts
Regional Administrator
United States Environmental Protection Agency
Region VIII
999 18th Street, Suite 300
Denver, CO 80202-2466

(Via Certified Mail/Return Receipt Requested)

Mr. Stephen L. Johnson
Acting Administrator
United States Environmental Protection Agency
Ariel Rios Building (1102A)
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460

(Via Certified Mail/Return Receipt Requested)

Mr. Alberto Gonzales
Attorney General
United States Department of Justice
950 Pennsylvania Avenue, N.W.
Washington, D.C. 20530-0001

(Via Certified Mail/Return Receipt Requested)



Frank P. Prager
Assistant General Counsel

1225 17th Street, Suite 900
Denver, Colorado 80202-5533
Phone: 303.294.8108
Fax: 303.294.8255

March 13, 2001

By Hand Delivery

Albion Carlson (8ENF-T)
United States Environmental Protection Agency
Region VIII
999 18th Street, Suite 300
Denver, Colorado 80202-2466

RECEIVED

MAR 13 2001

Office of Enforcement
Compliance & Environmental
Justice

Re: Request for Information Pursuant to Section 114(a) of the Clean Air Act Regarding EPA's
Coal-Fired Power Plant Investigation - Fourth Response of Public Service Company of
Colorado, Pawnee Station

Dear Mr. Carlson:

On January 2, 2001, Public Service Company of Colorado ("PSCo") received a request for information pursuant to Section 114(a) of the Clean Air Act regarding PSCo's Pawnee Station. By letter from PSCo's counsel (Bill Bumpers) dated January 16, 2001, PSCo provided a schedule for its responses to the information request. As set forth in that schedule, PSCo herewith provides responses to questions 5, 7, 13, and 14 from the information request.

(b) (4)



Question 7. "Monthly and annual emissions (lb/mmBTU and tons/year) of the following air pollutants. Emissions information responsive to this request includes emissions reports submitted to the applicable state regulatory agency, and all data obtained from any continuous

EPA8TEP009671

Mr. Albion Carlson

March 13, 2001

Page 2

emission monitor (CEM) installed in the flue gas stream. [Specify the timeframes and pollutants, where New Source Performance Standards (NSPS) emissions data has already been reported to the U.S. EPA, (i.e. Acid Rain CEM data/reports, NSPS data/reports, etc.). Acid Rain CEM data that has been submitted to EPA to comply with applicable NSPS requirements does not have to be resubmitted to satisfy this Section 114 information request letter]:

- (1) NO_x,
- (2) SO₂,
- (3) PM and PM₁₀,
- (4) Air Toxics (Pb/Hg/HCl/Other)."

Response. Air Pollution Emission Notices (APENs) submitted to the state of Colorado from 1991 to the present are enclosed with this letter. With the exception of the Acid Rain CEM data explicitly excluded by EPA from the response, PSCo has not calculated or submitted any other monthly or annual emissions information related to the Pawnee station to the state regulatory agency.

(b) (4)



Mr. Albion Carlson

March 13, 2001

Page 3

(b) (4)



The information and documents submitted in response to questions 5, 13, and 14 constitute Confidential Business Information as set forth in 40 C.F.R. §§2.201-2.311. Accordingly, the information and documents should not be made available as public information and the procedures and protections set forth in 40 C.F.R. §§2.100-2.121 should be followed upon request for or disclosures of the diagrams. The information and documents have been marked as Confidential Business Information.

PSCo is continuing the process of gathering and reviewing the voluminous documents requested by EPA in response to the other questions contained in the request for information. Should PSCo identify additional documents that are responsive to the questions for which responses have been provided in this letter, it will supplement its response.

Very truly yours,



Frank P. Prager

Attorney for Public Service Company of Colorado

Enclosures

cc: Bill Bumpers, Esq.

EPA8TEP009673

AIR POLLUTANT EMISSION NOTICE

PERMIT No.: 11MO674

AIRS ID.: 087.0011.001

FIRM NAME Public Service Company of Colorado

MAIL ADDRESS 550 15th Street, Ste 1000, Denver, Colorado 80202

PLANT NAME & LOCATION Pawnee Station, 14940 County Rd 24, Brush, CO 80723

HOME-BASE FOR PORTABLE SOURCES

STATE: CO ZIP: 80202

COUNTY: Morgan

PERSON TO CONTACT REGARDING THIS INFORMATION Gary Magno

TITLE Environmental Coordinator

PHONE (303) 571-7026

GENERAL DESCRIPTION OF THIS PLANT'S FUNCTION Electric Power Generation

A. GENERAL INFORMATION				Normal Operation of This Source				Process Seasonal Throughput (% of Annual)				ADDITIONAL INFORMATION OR REMARKS:											
No. of Employees		Land Area		Hours/Day	Days/Week	Weeks/Year	Dec-Feb	Mar-May	Jun-Aug	Sep-Nov													
B. STACK OR VENT INFORMATION (Identify below which stack if plant has two or more; refer to attached sketch of plant layout)																							
Height	Diameter	Temperature	Flow Rate	Velocity	Moisture	Plant ID No. for Stack																	
ft	ft	°F	ACFM	ft/min	%																		
C. FUEL INFORMATION				Design Input Rate (10 ⁶ BTU/HR) or Output (HP kW)		Kind of Fuel Burned		Annual Fuel Consumption		Fuel Heating Value: (BTU/lb. BTU/gal. or BTU/scf)		Per Cent by Weight		Seasonal Fuel Use (% of Annual Use)				Space Htg (% Ann)					
Description of Combustion Unit																							
Boiler #1								Requested level		Data year level		Sulfur		Ash		Dec-Feb	Mar-May	Jun-Aug	Sep-Nov				
Make Model:						Coal				2,504,910 tons		8,389 BTU/lb		0.34		4.7							
Serial No.:						Gas				53,637 mcf		937 BTU/scf											
D. PROCESS INFORMATION				RAW MATERIALS				Process Design Rate (Specify Units/Hour)		Finished Product Description		Finished Product-Annual Output											
Description of Processing Unit				Material Description		Annual Consumption						Requested level (specify units)		Data year level (specify units)									
						Requested level		Data year level															
Make Model:																							
Serial No.:																							
E. POLLUTION CONTROL EQUIPMENT				Overall Collection Efficiency		ESTIMATED EMISSIONS (TONS YEAR) AT THROUGHPUTS REQUESTED ABOVE		ACTUAL EMISSIONS (DATA YEAR)		ESTIMATION METHOD		CHECK ALL BOXES THAT APPLY											
Pollutant		Type of Control Equipment				CONTROLLED		UNCONTROLLED		(TONS)		<input type="checkbox"/> New or previously unreported source* <input type="checkbox"/> Requesting modification of existing permit† <input checked="" type="checkbox"/> Change in emissions, throughputs or equipment‡ <input type="checkbox"/> Transfer of ownership (list previous owner in REMARKS)‡ <input type="checkbox"/> Previous APEN is expiring‡ <input type="checkbox"/> Request for Emission Reduction Credit‡ <input type="checkbox"/> (Specify) _____											
		Primary	Secondary									* Complete all applicable portions of APEN † Complete "Requested level" values for permit limits ‡ Complete all information above box A, and those remaining portions which reflect changes											
Particulate		Baghouse		99.9						58.9		AP-42											
PM ₁₀		Baghouse		99.9						54.2		AP-42											
SO _x										16,665.8		CEMS											
NO _x		Low Nox Burners								5,319.7		CEMS											
VOC										75.2		AP-42											
CO										627.3		AP-42											
PLEASE USE APCD NON-CRITERIA REPORTABLE AIR POLLUTANT ADDENDUM FORM TO REPORT SUCH POLLUTANTS OR POLLUTANTS NOT LISTED ABOVE						<input type="checkbox"/> CHECK HERE IF YOU WISH THE DIVISION TO CALCULATE YOUR EMISSIONS. SEE "EMISSION ESTIMATES" INSTRUCTIONS ON BACK.																	
Signature of Person Legally Authorized to Supply Data:								DATE:				DATA YEAR (See Instructions on Reverse):											
Charles H. Fuller								09/24/00				1999											
Typed Name and Title:												Date source began or will begin operation:											
Charles H. Fuller, Vice President, Generation and Thermal Energy																							
THIS NOTICE IS VALID FOR FIVE YEARS. A revised notice shall be filed prior to this expiration date, whenever a permit limitation must be modified, whenever control equipment is changed, and annually whenever a significant emission change occurs. For specific details see Regulation 3, Part A, s II.C.1.						A \$100 FILING FEE IS REQUIRED FOR EACH NOTICE FILED.				Colorado Dept. of Public Health & Environment Air Pollution Control Division 4300 Cherry Creek Drive South, APCD-SS-B1 Denver, CO 80222-1530				APEN # 26 of 56 For Information, Call (303) 692-3150									
						Send completed forms with fees to:																	

(instructions on reverse side)

PROCESS DESCRIPTION

Stack height (or release point height)?	550	feet
---	-----	------

[illegible]

Signature: Jeff Fuller (APPLICANT - PLEASE FILL IN APEN # IN THE LOWER RIGHT HAND CORNER OF APEN AND IN THE SPACE ABOVE) Date: 09/24/00

I would like the Division to calculate my HAP emissions based on the production/consumption information listed on the APEN form.

AIR POLLUTANT EMISSION NOTICE

PERMIT No.: 11MO674 AIRS ID.: 087.00.1.001

FIRM NAME Public Service Company of Colorado

MAIL ADDRESS 550 15th Street, Ste 1000, Denver, Colorado 80202

PLANT NAME & LOCATION Pawnee Station, 14940 County Rd 24, Brush, CO 80723

STATE: CO ZIP: 80202

COUNTY: Morgan

HOME-BASE FOR PORTABLE SOURCES

PERSON TO CONTACT REGARDING THIS INFORMATION Gary Magno

TITLE Environmental Coordinator

PHONE (303) 571-7026

GENERAL DESCRIPTION OF THIS PLANT'S FUNCTION Electric Power Generation

A. GENERAL INFORMATION		Normal Operation of This Source			Process Seasonal Throughput (% of Annual)				ADDITIONAL INFORMATION OR REMARKS:
No. of Employees	Land Area	Hours/Day	Days/Week	Weeks/Year	Dec-Feb	Mar-May	Jun-Aug	Sep-Nov	

B. STACK OR VENT INFORMATION (Identify below which stack if plant has two or more; refer to attached sketch of plant layout)						
Height ft	Diameter ft	Temperature °F	Flow Rate ACFM	Velocity ft/min	Moisture %	Plant ID No. for Stack

C. FUEL INFORMATION		Design Input Rate (10 ⁶ BTU/HR) or Output (HP/kW)	Kind of Fuel Burned	Annual Fuel Consumption		Fuel Heating Value: (BTU/lb, BTU/gal, or BTU/scf)	Per Cent by Weight		Seasonal Fuel Use (% of Annual Use)				Space Htg (% Ann.)
Description of Combustion Unit	Boiler #1			Requested level	Data year level		Sulfur	Ash	Dec-Feb	Mar-May	Jun-Aug	Sep-Nov	
Make/Model:			Coal		2,104,339 tons	8,365 BTU/lb	0.54	4.67					
Serial No.:			Gas		138,249 mcf	921 BTU/scf							

D. PROCESS INFORMATION		RAW MATERIALS		Process Design Rate (Specify Units/Hour)	Finished Product Description	Finished Product-Annual Output	
Description of Processing Unit	Make/Model:	Material Description	Annual Consumption			Requested level (specify units)	Data year level (specify units)
Serial No.:							

E. POLLUTION CONTROL EQUIPMENT			Overall Collection Efficiency	ESTIMATED EMISSIONS (TONS/YEAR) AT THROUGHPUTS REQUESTED ABOVE		ACTUAL EMISSIONS (DATA YEAR) (TONS)	ESTIMATION METHOD	CHECK ALL BOXES THAT APPLY
Pollutant	Type of Control Equipment			CONTROLLED	UNCONTROLLED			
Particulate	Primary	Baghouse	99.9		49	AP-42	<input type="checkbox"/> New or previously unreported source* <input type="checkbox"/> Requesting modification of existing permit† <input checked="" type="checkbox"/> Change in emissions, throughputs or equipment‡ <input type="checkbox"/> Transfer of ownership (list previous owner in REMARKS)‡ <input type="checkbox"/> Previous APEN is expiring‡ <input type="checkbox"/> Request for Emission Reduction Credit† <input type="checkbox"/> (Specify) _____ * Complete all applicable portions of APEN † Complete "Requested level" values for permit limits ‡ Complete all information above box A, and those remaining portions which reflect changes	
PM ₁₀		Baghouse	99.9		45	AP-42		
SO _x					15,326	CEMS		
NO _x	Low Nox Burners				3,843	CEMS		
VOC					63	AP-42		
CO					529	AP-42		

PLEASE USE APCD NON-CRITERIA REPORTABLE AIR POLLUTANT ADDENDUM FORM TO REPORT SUCH POLLUTANTS OR POLLUTANTS NOT LISTED ABOVE

☐ CHECK HERE IF YOU WISH THE DIVISION TO CALCULATE YOUR EMISSIONS. SEE "EMISSION ESTIMATES" INSTRUCTIONS ON BACK.

Signature of Person Legally Authorized to Supply Data:

Charles H. Fuller

DATE: 4/23/99

DATA YEAR (See Instructions on Reverse):

1998

Typed Name and Title:

Charles H. Fuller, Vice President, Generation and Thermal Energy

Date source began or will begin operation:

THIS NOTICE IS VALID FOR FIVE YEARS. A revised notice shall be filed prior to this expiration date, whenever a permit limitation must be modified, whenever control equipment is changed, and annually whenever a significant emission change occurs. For specific details see Regulation 3, Part A, s ILC.1.

A \$100 FILING FEE IS REQUIRED FOR EACH NOTICE FILED.

Send completed forms with fees to:

Colorado Dept. of Public Health & Environment
Air Pollution Control Division
4300 Cherry Creek Drive South, APCD-SS-B1
Denver, CO 80222-1530

APEN # 33 of 62

For Information, Call
(303) 692-3150

(instructions on reverse side)

PROCESS DESCRIPTION Unit 1

Stack height (or release point height)?	550	feet
---	-----	------

C 0006150

(APPLICANT - PLEASE FILL IN APEN # IN THE LOWER RIGHT HAND CORNER OF APEN AND IN THE SPACE ABOVE)

Date: 4/23/99

EPA8TEP009678

AIR POLLUTANT EMISSION NOTICE

PERMIT No.:

11MO674

AIRS ID.:

08700

11

FIRM NAME Public Service Company of Colorado

MAIL ADDRESS 550 15th Street, Ste 1000, Denver, Colorado 80202

PLANT NAME & LOCATION Pawnee Station, 14940 County Rd 24, Brush, CO 80723

STATE: CO

ZIP: 80202

COUNTY: Morgan

HOME-BASE FOR PORTABLE SOURCES

PERSON TO CONTACT REGARDING THIS INFORMATION

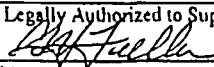
Gary Magno

TITLE Environmental Coordinator

PHONE (303) 571-7026

GENERAL DESCRIPTION OF THIS PLANT'S FUNCTION

Electric Power Generation

A. GENERAL INFORMATION				Normal Operation of This Source				Process Seasonal Throughput (% of Annual)				ADDITIONAL INFORMATION OR REMARKS:					
No. of Employees		Land Area		Hours/Day	Days/Week	Weeks/Year	Dec-Feb	Mar-May	Jun-Aug	Sep-Nov							
B. STACK OR VENT INFORMATION (Identify below which stack if plant has two or more; refer to attached sketch of plant layout)																	
Height	Diameter	Temperature	Flow Rate	Velocity	Moisture	Plant ID No. for Stack											
ft	ft	°F	ACFM	ft/min	%												
C. FUEL INFORMATION				Design Input Rate (10 ⁶ BTU/Hr) or Output (HP/kW)		Kind of Fuel Burned		Annual Fuel Consumption		Fuel Heating Value: (BTU/lb, BTU/gal, or BTU/scf)		Per Cent by Weight		Seasonal Fuel Use (% of Annual Use)		Space Htg (% Ann.)	
Description of Combustion Unit																	
Boiler #1						Coal		Requested level Data year level		8,315 BTU/lb		Sulfur Ash		Dec-Feb Mar-May Jun-Aug Sep-Nov			
Make/Model:						Gas		101,675 mcf		1,062 BTU/scf		0.38 4.64					
Serial No.:																	
D. PROCESS INFORMATION				RAW MATERIALS				Process Design Rate (Specify Units/Hour)		Finished Product Description		Finished Product-Annual Output					
Description of Processing Unit				Material Description		Annual Consumption Requested level Data year level						Requested level (specify units)		Data year level (specify units)			
Make/Model:																	
Serial No.:																	
E. POLLUTION CONTROL EQUIPMENT				Overall Collection Efficiency		ESTIMATED EMISSIONS (TONS/YEAR) AT THROUGHPUT'S REQUESTED ABOVE		ACTUAL EMISSIONS (DATA YEAR) (TONS)		ESTIMATION METHOD		CHECK ALL BOXES THAT APPLY					
Pollutant		Type of Control Equipment				CONTROLLED UNCONTROLLED											
		Primary Secondary										<input type="checkbox"/> New or previously unreported source* <input type="checkbox"/> Requesting modification of existing permit† <input checked="" type="checkbox"/> Change in emissions, throughputs or equipment‡ <input type="checkbox"/> Transfer of ownership (list previous owner in REMARKS)† <input type="checkbox"/> Previous APEN is expiring‡ <input type="checkbox"/> Request for Emission Reduction Credit† <input type="checkbox"/> (Specify) _____ * Complete all applicable portions of APEN † Complete "Requested level" values for permit limits ‡ Complete all information above box A, and those remaining portions which reflect changes					
Particulate		Baghouse		99.9				45		AP-42							
PM ₁₀		Baghouse		99.9				42		AP-42							
SO _x								13,929		CEMS							
NO _x		Low Nox Burners						3,873		CEMS							
VOC								59		AP-42							
CO								490		AP-42							
PLEASE USE APCD NON-CRITERIA REPORTABLE AIR POLLUTANT ADDENDUM FORM TO REPORT SUCH POLLUTANTS OR POLLUTANTS NOT LISTED ABOVE						<input type="checkbox"/> CHECK HERE IF YOU WISH THE DIVISION TO CALCULATE YOUR EMISSIONS. SEE "EMISSION ESTIMATES" INSTRUCTIONS ON BACK.											
Signature of Person Legally Authorized to Supply Data:								DATE:				DATA YEAR (See Instructions on Reverse):					
								4/27/98				1997					
Typed Name and Title:												Date source began or will begin operation:					
Charles H. Fuller, General Manager, Commodity Services																	
THIS NOTICE IS VALID FOR FIVE YEARS. A revised notice shall be filed prior to this expiration date, whenever a permit limitation must be modified, whenever control equipment is changed, and annually whenever a significant emission change occurs. For specific details see Regulation 3, Part A, s ILC.1.						A \$100 FILING FEE IS REQUIRED FOR EACH NOTICE FILED.		Colorado Dept. of Public Health & Environment Air Pollution Control Division 4300 Cherry Creek Drive South, APCD-SS-B1 Denver, CO 80222-1530				APEN # 26 of 45 For Information, Call (303) 692-3150					
						Send completed forms with fees to:											

(instructions on reverse side)

PROCESS DESCRIPTION

Slack height (or release point height)?	550	feet
---	-----	------

C 0006152

Signature: Bob Fuller (APPLICANT - PLEASE FILL IN APEN # IN THE LOWER RIGHT HAND CORNER OF APEN AND IN THE SPACE ABOVE) Date: 4/27/98

I would like the Division to calculate my HAP emissions based on the production/consumption information listed on the APEN form.

EPA8TEP009680

AIR POLLUTANT EMISSION NOTICE

PERMIT No.: _____

AIRS ID.: _____

FIRM NAME Public Service Company of Colorado

MAIL ADDRESS 550 15th Street, Ste 1000, Denver, Colorado 80202

PLANT NAME & LOCATION Pawnee Station, 14940 County Rd 24, Brush, CO 80723

HOME-BASE FOR PORTABLE SOURCES _____

PERSON TO CONTACT REGARDING THIS INFORMATION _____

Mark R. Fox

TITLE Team Lead, Air & Water Programs

PHONE (303) 571-7047

GENERAL DESCRIPTION OF THIS PLANT'S FUNCTION _____

Electric Power Generation

A. GENERAL INFORMATION		Normal Operation of This Source			Process Seasonal Throughput (% of Annual)				ADDITIONAL INFORMATION OR REMARKS:							
No. of Employees	Land Area	Hours/Day	Days/Week	Weeks/Year	Dec-Feb	Mar-May	Jun-Aug	Sep-Nov								
B. STACK OR VENT INFORMATION (Identify below which stack if plant has two or more; refer to attached sketch of plant layout)																
Height	Diameter	Temperature	Flow Rate	Velocity	Moisture	Plant ID No. for Stack										
ft	ft	°F	ACFM	ft/min	%											
C. FUEL INFORMATION		Design Input Rate (10 ⁶ BTU/HR) or Output (HP.kW)	Kind of Fuel Burned	Annual Fuel Consumption		Fuel Heating Value: (BTU/lb, BTU/gal, or BTU/SCF)	Per Cent by Weight	Seasonal Fuel Use (% of Annual Use)				Space Hgt (% Ann.)				
Description of Combustion Unit				Requested level	Data year level		Sulfur	Ash	Dec-Feb	Mar-May	Jun-Aug	Sep-Nov				
Boiler #1			Coal		1,853,798 tons	10,548	0.37	7.92								
Make Model:			Gas		186,353 mcf											
Serial No.:																
D. PROCESS INFORMATION		RAW MATERIALS			Process Design Rate (Specify Units/Hour)		Finished Product Description		Finished Product-Annual Output							
Description of Processing Unit		Material Description	Annual Consumption						Requested level (specify units)		Data year level (specify units)					
			Requested level	Data year level												
Make Model:																
Serial No.:																
E. POLLUTION CONTROL EQUIPMENT		Overall Collection Efficiency	ESTIMATED EMISSIONS (TONS/YEAR) AT THROUGHPUTS REQUESTED ABOVE		ACTUAL EMISSIONS (DATA YEAR)	ESTIMATION METHOD	CHECK ALL BOXES THAT APPLY									
Pollutant	Type of Control Equipment		CONTROLLED	UNCONTROLLED	(TONS)		<input type="checkbox"/> New or previously unreported source* <input type="checkbox"/> Requesting modification of existing permit† <input checked="" type="checkbox"/> Change in emissions, throughputs or equipment† <input type="checkbox"/> Transfer of ownership (list previous owner in REMARKS)† <input type="checkbox"/> Previous APEN is expiring† <input type="checkbox"/> Request for Emission Reduction Credit† <input type="checkbox"/> (Specify) _____ * Complete all applicable portions of APEN † Complete "Requested level" values for permit limits ‡ Complete all information above box A, and those remaining portions which reflect changes									
Particulate	Primary Secondary				44	AP-42										
PM ₁₀					40	AP-42										
SO _x					11633	CEMS										
NO _x					3525	CEMS										
VOC					56	AP-42										
CO					467	AP-42										
PLEASE USE APCD NON-CRITERIA REPORTABLE AIR POLLUTANT ADDENDUM FORM TO REPORT SUCH POLLUTANTS OR POLLUTANTS NOT LISTED ABOVE			<input type="checkbox"/> CHECK HERE IF YOU WISH THE DIVISION TO CALCULATE YOUR EMISSIONS. SEE "EMISSION ESTIMATES" INSTRUCTIONS ON BACK.													
Signature of Person Legally Authorized to Supply Data:					DATE:	DATA YEAR (See Instructions on Reverse):										
<u>Mark R. Fox</u>					5-1-97	1996										
Typed Name and Title:					Date source began or will begin operation:											
Mark R. Fox, P.E., Team Lead, Air & Water Programs																
THIS NOTICE IS VALID FOR FIVE YEARS. A revised notice shall be filed prior to this expiration date, whenever a permit limitation must be modified, whenever control equipment is changed, and annually whenever a significant emission change occurs. For specific details see Regulation 3, Part A, § C.C.1.			A \$100 FILING FEE IS REQUIRED FOR EACH NOTICE FILED.		Colorado Dept. of Public Health & Environment Air Pollution Control Division 4300 Cherry Creek Drive South, APCD-SS-B1 Denver, CO 80222-1530		APEN # _____ of _____ For Information, Call (303) 692-3150									
			Send completed forms with fees to:													

HAZARDOUS AIR POLLUTANT EMISSION NOTICE ADDENDUM FORM

(instructions on reverse side)

FIRM NAME Public Service Company of Colorado, Pawnee Station

PROCESS DESCRIPTION Unit 1

Distance to nearest property line from stack (or release point)? _____ feet

Stack height (or release point height)? 550 feet

Chemical Abstract Service Number	Chemical Name	Reporting Bin	Control Equipment/ Efficiency	Emission Factor (lb/10 ¹² Btu)	Emission Factor Source	Requested Emissions (lb/yr)	Data Year Actual Emissions (lb/yr)
	Antimony compounds	A	NA	NA	NA	NA	NA
	Arsenic compounds	A	96.7	684	AP-42	40037	716.0
	Beryllium compounds	A	99.8	81	AP-42	287	5.1
	Cadmium compounds	A	94.9	44	AP-42	4016	71.8
	Chromium compounds	A	98.7	1,910	AP-42	44042	787.7
	Cobalt compounds	A	99.3	NA	NA	NA	NA
	Lead compounds	A	99.3	507	AP-42	6295	112.6
	Manganese compounds	A	99.5	1,604	AP-42	14225	254.4
	Mercury compounds	A	78.2	16	AP-42	6187	110.6
	Nickel compounds	A	95.1	1,160	AP-42	100819	1803.1
	Selenium compounds	A	98.4	NA	NA	NA	NA
	Thallium compounds	A	NA	NA	NA	NA	NA
C 0006154 50000	Formaldehyde	A	0	112	AP-42	5456	3552.9

THIS FORM IS AN ADDENDUM TO APEN # 15

(APPLICANT - PLEASE FILL IN APEN # IN THE LOWER RIGHT HAND CORNER OF APEN AND IN THE SPACE ABOVE)

Signature: Oliver Plunk for Mark Fox

Date: 5-1-97

EPA8TEP009682

AIR POLLUTANT EMISSION NOTICE

Firm Name: Public Service Company of Colorado -Pawnee Station Permit: C11M0674
 Mail Address: 550 15th Street, Suite 1000, Denver, CO 80202 Plant Location: 14940 Cnty Rd 24, Brush, CO 80723 County: Morgan
 Person to Contact Regarding this Information: Mark R. Fox, P.E. Title: Team Lead, Air & Water Quality Programs Phone: (303) 571-7047
 General Description of this Plant's Function: Electric Power Generation

A. GENERAL INFORMATION		Normal Operation of Plant			Process Seasonal Throughput (%) of Annual				ADDITIONAL INFORMATION OR REMARKS			
No. Of Employees 110	Land Area 1730 acres	Hrs/Day 24 Hrs	Hrs/Year 8760	Days/Wk 7	Dec-Feb	Mar-May	Jun-Aug	Sep-Nov	Corrections to 95 Update			

B. STACK OR VENT INFORMATION (Identify below which stack if plant has two or more; refer to attached sketch of plant layout.)									
Height 550 ft	Diameter 23.5 ft	Temperature 328 F	Flow Rate 2251000 ACFM	Velocity	Moisture 30.68	Plant ID for Stack S001			

C. FUEL INFORMATION		C 0006155	Design Rate (106 BTU/HR)	Kind of Fuel Burned	Annual Fuel Consumption Requested Level	Data Yr. Level	Fuel Heating Value (BTU/lb, BTU/gal, or BTU/SCF)	Per Cent by Weight Sulfur Ash	Seasonal Fuel Use (% of Annual Use)	Space Htg (% annual)
Description of Combustion Unit										
#1 Boiler				Coal	2193837 tons		8880 BTU/lb	0.38	4.8	
Make/Model: Foster Wheeler 2-79-2381				Gas	174933 mcf		1069 BTU/scf	0.0143	na	
Serial No. na				Oil	3121 gal		134766 BTU/gal	0.1	.1	

D. PROCESS INFORMATION		Raw Materials Used		Raw Materials Annual Consumption		Design Rate (Specify Units/Hour)		Finished Product Description		Finished Product Annual Output	
Description of Combustion Unit		Description	Requested Level	Data Yr. Level					Requested Level	Data Year Level	
Make/Model:											
Serial No.											

E. POLLUTION CONTROL EQUIPMENT			ESTIMATED EMISSIONS (TONS/YEAR) AT THROUGHPUTS REQUESTED ABOVE		Actual Emissions (Data Year) 12/31/95		Estimation Method		CHECK ALL BOXES THAT APPLY <input type="checkbox"/> New or previously unreported source* <input type="checkbox"/> Requesting modification of existing permit + ± XX Change in emissions, throughputs or equip. ± <input type="checkbox"/> Transfer of ownership (list previous owner in REMARKS section of box A) ± <input type="checkbox"/> Relocation of Source ± <input type="checkbox"/> Previous APEN is expiring ± <input type="checkbox"/> Mandatory update or deferred reporting ± <input type="checkbox"/> Request for emission reduction credit + ± * Complete all applicable portions of APEN + Complete shaded areas ('requested values') ± Complete all information above box A, and those remaining portions which reflect changes.	
Pollutant	Primary	Secondary	Controlled	Uncontrolled	(In Tons)					
Particulate					53	AP-42				
PM10					48	AP-42				
SO2					15120.8	CEM				
NO2					5968.07	CEM				
VOC					66	AP-42				
CO					552	AP-42				

PLEASE USE APCD HAP ADDENDUM FORM TO REPORT HAZARDOUS AIR POLLUTANT EMISSIONS OR OTHER POLLUTANTS NOT LISTED ABOVE.			<input type="checkbox"/> CHECK HERE IF YOU WISH THE DIVISION TO CALCULATE YOUR EMISSIONS. SEE "EMISSION ESTIMATES" INSTRUCTIONS ON BACK.		
---	--	--	--	--	--

Signature of Person Legally Authorized to Supply Data: <u>Mark R. Fox</u>		Date: <u>August 22, 1996</u>	Date Year (See Instructions of Reverse): <u>12/31/95</u>
Typed Name and Title: <u>Mark R. Fox, P.E., Team Lead, Air and Water Quality</u>		Date Source began or will begin Operation: <u>11/1/81</u>	

THIS NOTICE IS VALID FOR FIVE YEARS. A revised notice shall be filed prior to this expiration date, whenever a permit limitation must be modified, whenever control equipment is changed, and annually.		A \$100 FILING FEE IS REQUIRED FOR EACH NOTICE FILED	Mail to: Colorado Depart. Of Public Health and Environment, APCD-SS-81	APEN # <u> </u> of <u> </u>
				AIRS ID (APCD Use)

AIR POLLUTANT EMISSION NOTICE

FIRM NAME PUBLIC SERVICE COMPANY OF COLORADO-PAWNEE STATION PERMIT NO. C11674
 MAIL ADDRESS P.O. BOX 840, DENVER, CO 80201-0840 PLANT LOCATION 14940 COUNTY RD. 24, BRUSH, CO COUNTY MORGAN
 PERSON TO CONTACT REGARDING THIS INFORMATION MARK R. FOX TITLE TEAM LEAD, AIR/WATER PROGRAMS PHONE (303) 294-8179
 GENERAL DESCRIPTION OF THIS PLANT'S FUNCTION ELECTRICITY GENERATION FEDERAL TAX I.D. NO. _____

A. GENERAL INFORMATION					Normal Operation of Plant				Process Seasonal Throughput (% of Annual)				ADDITIONAL INFORMATION OR REMARKS:
No. of Employees	Land Area	Hours/Day	Hours/Year	Days/Week	Dec-Feb	Mar-May	Jun-Aug	Sep-Nov					

B. STACK OR VENT INFORMATION (Identify below which stack if plant has two or more; refer to attached sketch of plant layout)									
Height	Diameter	Temperature	Flow Rate	Velocity	Moisture	Plant ID No. for Stack			
ft	ft	°F	ACFM	ft/min	%	Unit #1			

C. FUEL INFORMATION		Design Rate	Kind of Fuel	Annual Fuel Consumption		Fuel Heating Value:	Per Cent by Weight		Seasonal Fuel Use (% of Annual Use)				Space Hig
Description of Combustion Unit		(10 ⁶ BTU/HR)	Burned	Requested level	Data year	(BTU/lb, BTU/gal, or BTU/SCF)	Sulfur	Ash	Dec-Feb	Mar-May	Jun-Aug	Sep-Nov	(% Ann.)
P.C. Boiler			Sub-Bit		1816994 tons		.33	4.7					
Make/Model:			Coal										
Serial No.													

D. PROCESS INFORMATION		Raw Materials Used		Raw Materials-Annual Consumption		Design Rate	Finished Product	Finished Product-Annual Output	
Description of Processing Unit		Description	Requested level	Data year level		(Specify Units/Hour)	Description	Requested level	Data year level
Make/Model:									
Serial No.:									

E. POLLUTION CONTROL EQUIPMENT			Overall Collection Efficiency	ESTIMATED EMISSIONS (TONS/YEAR) AT THROUGHPUTS REQUESTED ABOVE		ACTUAL EMISSIONS (DATA YEAR)	ESTIMATION METHOD	CHECK ALL BOXES THAT APPLY
Pollutant	Type of Control Equipment			CONTROLLED	UNCONTROLLED			
Particulate	010		99.2			341.6 tons	AIRS	<input type="checkbox"/> New or previously unreported source* <input type="checkbox"/> Requesting modification of existing permit† <input type="checkbox"/> Change in emissions, throughputs or equipment‡ <input type="checkbox"/> Transfer of ownership (List previous owner in REMARKS section of box A.)† <input type="checkbox"/> Relocation of Source‡ <input type="checkbox"/> Previous APEN is expiring‡ <input type="checkbox"/> Mandatory update or deferred reporting‡ <input type="checkbox"/> Request for Emission Reduction Credit† * Complete all applicable portions of APEN † Complete shaded areas ("Requested" values) ‡ Complete all information above box A, and those remaining portions which reflect changes
PM ₁₀	010		97.7			225.9	AIRS	
SO ₂	000					9484.7	CEM	
NO _x	029		57.4			8127.4	CEM	
VOC	000					63.6	AIRS	
CO	000					545.1	AIRS	
PLEASE USE APCD HAP ADDENDUM FORM TO REPORT HAZARDOUS AIR POLLUTANT EMISSIONS OR OTHER POLLUTANTS NOT LISTED ABOVE.			<input type="checkbox"/> CHECK HERE IF YOU WISH THE DIVISION TO CALCULATE YOUR EMISSIONS. SEE "EMISSION ESTIMATES" INSTRUCTIONS ON BACK.					

Signature of Person Legally Authorized to Supply Data: <u>Mark R. Fox</u>		DATE: <u>4-27-95</u>	DATA YEAR (See Instructions on Reverse): 1994
Typed Name and Title: MARK R. FOX, TEAM LEAD, AIR/WATER PROGRAMS		Date source began or will begin operation:	

THIS NOTICE IS VALID FOR FIVE YEARS. A revised notice shall be filed prior to this expiration date, whenever a permit limitation must be modified, whenever control equipment is changed, and annually whenever a significant emission change occurs. For specific details see Regulation 3, Part A, § II.C.1.	A \$100 FILING FEE IS REQUIRED FOR EACH NOTICE FILED. For information, call (303)692-3150. <small>APCD FORM 200A (7/92)</small>	Mail to: COLORADO DEPARTMENT OF HEALTH APCD-SS-B1 4300 Cherry Creek Drive South Denver, Colorado 80222-1530	APEN # _____ OF _____ AIRS ID (APCD USE) _____
--	--	---	---

EPA8TEP009684

Submitted to State

AIR POLLUTANT EMISSION NOTICE

FIRM NAME PUBLIC SERVICE COMPANY OF COLORADO-PAWNEE STATION

PERMIT NO. C11674

MAIL ADDRESS P.O. BOX 840, DENVER, CO 80201-0840

PLANT LOCATION 14940 COUNTY RD. 24, BRUSH, CO

COUNTY MORGAN

PERSON TO CONTACT REGARDING THIS INFORMATION MARK R. FOX

TITLE TEAM LEAD, AIR/WATER PROGRAMS

PHONE (303) 294-8179

GENERAL DESCRIPTION OF THIS PLANT'S FUNCTION ELECTRICITY GENERATION

FEDERAL TAX I.D. NO.

A. GENERAL INFORMATION		Normal Operation of Plant			Process Seasonal Throughput (% of Annual)				ADDITIONAL INFORMATION OR REMARKS:									
No. of Employees	Land Area	Hours/Day	Hours/Year	Days/Week	Dec-Feb	Mar-May	Jun-Aug	Sep-Nov										
B. STACK OR VENT INFORMATION (Identify below which stack if plant has two or more; refer to attached sketch of plant layout)																		
Height ft	Diameter ft	Temperature °F	Flow Rate ACFM	Velocity ft/min	Moisture %	Plant ID No. for Stack Unit #1												
C. FUEL INFORMATION		Design Rate (10 ⁶ BTU/HR)	Kind of Fuel Burned	Annual Fuel Consumption		Fuel Heating Value: (BTU/lb, BTU/gal, or BTU/SCF)		Per Cent by Weight		Seasonal Fuel Use (% of Annual Use)				Space Htg (% Ann.)				
Description of Combustion Unit				Requested level	Data year			Sulfur	Ash	Dec-Feb	Mar-May	Jun-Aug	Sep-Nov					
P.C. Boiler			Nat. Gas		124.632 MMCF			0	0									
Make/Model:																		
Serial No.																		
D. PROCESS INFORMATION		Raw Materials Used		Raw Materials-Annual Consumption		Design Rate		Finished Product		Finished Product-Annual Output								
Description of Processing Unit		Description		Requested level		Data year level		Description		Requested level		Data year level						
Make/Model:																		
Serial No.:																		
E. POLLUTION CONTROL EQUIPMENT		Overall Collection Efficiency		ESTIMATED EMISSIONS (TONS/YEAR) AT THROUGHPUTS REQUESTED ABOVE		ACTUAL EMISSIONS (DATA YEAR)		ESTIMATION METHOD		CHECK ALL BOXES THAT APPLY								
Pollutant	Type of Control Equipment									<input type="checkbox"/> New or previously unreported source*								
	Primary	Secondary								<input type="checkbox"/> Requesting modification of existing permit†								
Particulate	010					0.2 ton		AIRS		<input type="checkbox"/> Change in emissions, throughputs or equipment†								
PM ₁₀	010					0.2		AIRS		<input type="checkbox"/> Transfer of ownership (List previous owner in REMARKS section of box A.)†								
SO ₂	000					0.0		AIRS		<input type="checkbox"/> Relocation of Source†								
NO _x	000					34.3		AIRS		<input type="checkbox"/> Previous APEN is expiring†								
VOC	000					0.1		AIRS		<input type="checkbox"/> Mandatory update or deferred reporting†								
CO	000					2.5		AIRS		<input type="checkbox"/> Request for Emission Reduction Credit†								
PLEASE USE APCD HAP ADDENDUM FORM TO REPORT HAZARDOUS AIR POLLUTANT EMISSIONS OR OTHER POLLUTANTS NOT LISTED ABOVE.				<input type="checkbox"/> CHECK HERE IF YOU WISH THE DIVISION TO CALCULATE YOUR EMISSIONS. SEE "EMISSION ESTIMATES" INSTRUCTIONS ON BACK.														
Signature of Person Legally Authorized to Supply Data: <i>Mark Fox</i>				DATE: 4-27-95				DATA YEAR (See Instructions on Reverse): 1994										
Typed Name and Title: MARK R. FOX, TEAM LEAD, AIR & WATER PROGRAMS				Date source began or will begin operation:														

C 0006157

THIS NOTICE IS VALID FOR FIVE YEARS. A revised notice shall be filed prior to this expiration date, whenever a permit limitation must be modified, whenever control equipment is changed, and annually whenever a significant emission change occurs. For specific details see Regulation 3, Part A, § II.C.1.

A \$100 FILING FEE IS REQUIRED
FOR EACH NOTICE FILED.

For information, call (303)692-3150.

APCD FORM 100A (1/72)

Mail to:
COLORADO DEPARTMENT OF HEALTH
APCD-SS-B1
4300 Cherry Creek Drive South
Denver, Colorado 80222-1530

APEN # _____ OF _____
AIRS ID (APCD USE)

EPA8TEP009685

AIR POLLUTANT EMISSION NOTICE

FIRM NAME PUBLIC SERVICE COMPANY OF COLORADO-PAWNEE STATION PERMIT NO. C11674
 MAIL ADDRESS P.O. BOX 840, DENVER, CO 80201-0840 PLANT LOCATION 14940 COUNTY RD. 24, BRUSH, CO COUNTY MORGAN
 PERSON TO CONTACT REGARDING THIS INFORMATION PETER J. COHLMIA TITLE CHIEF ENVIRONMENTAL SCIENTIST PHONE (303) 294-2810
 GENERAL DESCRIPTION OF THIS PLANT'S FUNCTION ELECTRICITY GENERATION FEDERAL TAX I.D. NO. _____

GENERAL DESCRIPTION OF THIS PLANT'S FUNCTION: ELECTRICITY GENERATION									ADDITIONAL INFORMATION OR REMARKS:
A. GENERAL INFORMATION		Normal Operation of Plant			Process Seasonal Throughput (% of Annual)				
No. of Employees	Land Area	Hours/Day	Hours/Year	Days/Week	Dec-Feb	Mar-May	Jun-Aug	Sep-Nov	

B. STACK OR VENT INFORMATION (Identify below which stack if plant has two or more; refer to attached sketch of plant layout)									
Height ft	Diameter ft	Temperature °F	Flow Rate ACFM	Velocity ft/min	Moisture %	Plant ID No. for Stack Unit #1			

C. FUEL INFORMATION		Design Rate (10 ⁶ BTU/HR)	Kind of Fuel Burned	Annual Fuel Consumption		Fuel Heating Value: (BTU/lb, BTU/gal, or BTU/SCF)	Per Cent by Weight		Seasonal Fuel Use (% of Annual Use)				Space Htg (% Ann.)
Description of Combustion Unit				Requested level			Sulfur	Ash	Dec-Feb	Mar-May	Jun-Aug	Sep-Nov	
P.C. Boiler			Sub-Bit		2013357 tons		.35	4.5					
Make/Model:			Coal										
Serial No.													

D. PROCESS INFORMATION		Raw Materials Used		Raw Materials-Annual Consumption		Design Rate (Specify Units/Hour)	Finished Product Description	Finished Product-Annual Output	
Description of Processing Unit		Description	Requested level	Data year level				Requested level	Data year level
Make/Model:									
Serial No.:									

E. POLLUTION CONTROL EQUIPMENT			Overall Collection Efficiency	ESTIMATED EMISSIONS (TONS/YEAR) AT THROUGHPUTS REQUESTED ABOVE		ACTUAL EMISSIONS (DATA YEAR)	ESTIMATION METHOD	CHECK ALL BOXES THAT APPLY
Pollutant	Type of Control Equipment			CONTROLLED	UNCONTROLLED			
	Primary	Secondary						
Particulate	010		99.2			362.4 tons	AIRS	<input type="checkbox"/> New or previously unreported source*
PM ₁₀	010		97.7			239.6	AIRS	<input type="checkbox"/> Requesting modification of existing permit†
SO _x	000					10509.7	CEM	<input checked="" type="checkbox"/> Change in emissions, throughputs or equipment‡
NO _x	029		57.4			9005.7	CEM	<input type="checkbox"/> Transfer of ownership (List previous owner in REMARKS section of box A.)‡
CO	000					70.5	AIRS	<input type="checkbox"/> Relocation of Source‡
CO	000					604	AIRS	<input type="checkbox"/> Previous APEN is expiring‡
								<input type="checkbox"/> Mandatory update or deferred reporting‡
								<input type="checkbox"/> Request for Emission Reduction Credit††
								* Complete all applicable portions of APEN

PLEASE USE APCD HAP ADDENDUM FORM TO REPORT HAZARDOUS AIR POLLUTANT EMISSIONS OR OTHER POLLUTANTS NOT LISTED ABOVE.

☐ CHECK HERE IF YOU WISH THE DIVISION TO CALCULATE YOUR EMISSIONS. SEE "EMISSION ESTIMATES" INSTRUCTIONS ON BACK.

Signature of Person Legally Authorized to Supply Data: Peter J. Cohlma DATE: 4/29/94 DATA YEAR (See Instructions on Reverse): 1993

Typed Name and Title: PETER J. COHLMIA, CHIEF ENVIRONMENTAL SCIENTIST Date source began or will begin operation: _____

THIS NOTICE IS VALID FOR FIVE YEARS. A revised notice shall be filed prior to this expiration date, whenever a permit limitation must be modified, whenever control equipment is changed, and annually whenever a significant emission change occurs. For specific details see Regulation 3, Part A, § II.C.1.

A \$100 FILING FEE IS REQUIRED FOR EACH NOTICE FILED.

For information, call (303)692-3150.

Mail to:
 COLORADO DEPARTMENT OF HEALTH
 APCD-SS-B1
 4300 Cherry Creek Drive South
 Denver, Colorado 80222-1530

APEN # 1 OF 3
 AIRS ID (APCD USE)

EPA8TEP009686

AIR POLLUTANT EMISSION NOTICE

FIRM NAME PUBLIC SERVICE COMPANY OF COLORADO-PAWNEE STATION PERMIT NO. C11674
 MAIL ADDRESS P.O. BOX 840, DENVER, CO 80201-0840 PLANT LOCATION 14940 COUNTY RD. 24, BRUSH, CO COUNTY MORGAN
 PERSON TO CONTACT REGARDING THIS INFORMATION PETER J. COHLMIA TITLE CHIEF ENVIRONMENTAL SCIENTIST PHONE (303) 294-2810
 GENERAL DESCRIPTION OF THIS PLANT'S FUNCTION ELECTRICITY GENERATION FEDERAL TAX I.D. NO. _____

A. GENERAL INFORMATION		Normal Operation of Plant			Process Seasonal Throughput (% of Annual)				ADDITIONAL INFORMATION OR REMARKS:
No. of Employees	Land Area	Hours/Day	Hours/Year	Days/Week	Dec-Feb	Mar-May	Jun-Aug	Sep-Nov	

B. STACK OR VENT INFORMATION (Identify below which stack if plant has two or more; refer to attached sketch of plant layout)									
Height ft	Diameter ft	Temperature °F	Flow Rate ACFM	Velocity ft/min	Moisture %	Plant ID No. for Stack Unit #1			

C. FUEL INFORMATION		Design Rate (10 ⁶ BTU/HR)	Kind of Fuel Burned	Annual Fuel Consumption		Fuel Heating Value: (BTU/lb, BTU/gal, or BTU/SCF)	Per Cent by Weight		Seasonal Fuel Use (% of Annual Use)				Space Htg (% Ann.)
Description of Combustion Unit				Requested level			Sulfur	Ash	Dec-Feb	Mar-May	Jun-Aug	Sep-Nov	
P.C. Boiler			Oil		11.756 mgal		.36	0					
Make/Model:													
Serial No.													

D. PROCESS INFORMATION		Raw Materials Used	Raw Materials-Annual Consumption		Design Rate (Specify Units/Hour)	Finished Product	Finished Product-Annual Output	
Description of Processing Unit		Description	Requested level	Data year level		Description	Requested level	Data year level
Make/Model:								
Serial No.:								

E. POLLUTION CONTROL EQUIPMENT			Overall Collection Efficiency	ESTIMATED EMISSIONS (TONS/YEAR) AT THROUGHPUTS REQUESTED ABOVE		ACTUAL EMISSIONS (DATA YEAR)	ESTIMATION METHOD	CHECK ALL BOXES THAT APPLY
Pollutant	Type of Control Equipment			CONTROLLED	UNCONTROLLED			
	Primary	Secondary						
Particulate	010		99.2			0	AIRS	<input type="checkbox"/> New or previously unreported source*
PM ₁₀	010		97.7			0	AIRS	<input type="checkbox"/> Requesting modification of existing permit†
SO ₂	000		0			0.3 ton	AIRS	<input checked="" type="checkbox"/> Change in emissions, throughputs or equipment‡
NO _x	000		0			.1	AIRS	<input type="checkbox"/> Transfer of ownership (List previous owner in REMARKS section of box A.)‡
VOC	000		0			0	AIRS	<input type="checkbox"/> Relocation of Source‡
CO	000		0			0	AIRS	<input type="checkbox"/> Previous APEN is expiring‡
PLEASE USE APCD HAP ADDENDUM FORM TO REPORT HAZARDOUS AIR POLLUTANT EMISSIONS OR OTHER POLLUTANTS NOT LISTED ABOVE.				<input type="checkbox"/> CHECK HERE IF YOU WISH THE DIVISION TO CALCULATE YOUR EMISSIONS. SEE "EMISSION ESTIMATES" INSTRUCTIONS ON BACK.				<input type="checkbox"/> Mandatory update or deferred reporting‡
								<input type="checkbox"/> Request for Emission Reduction Credit††
								* Complete all applicable portions of APEN
								† Complete shaded areas ("Requested" values)
								‡ Complete all information above box A, and those remaining portions which reflect changes

Signature of Person Legally Authorized to Supply Data: Peter J. Cohlma DATE: 4/29/94 DATA YEAR (See Instructions on Reverse): 1993
 Typed Name and Title: PETER J. COHLMIA, CHIEF ENVIRONMENTAL SCIENTIST Date source began or will begin operation: _____

THIS NOTICE IS VALID FOR FIVE YEARS. A revised notice shall be filed prior to this expiration date, whenever a permit limitation must be modified, whenever control equipment is changed, and annually whenever a significant emission change occurs. For specific details see Regulation 3, Part A, § II.C.1.
A \$100 FILING FEE IS REQUIRED FOR EACH NOTICE FILED.
 For information, call (303)692-3150.

Mail to:
 COLORADO DEPARTMENT OF HEALTH
 APCD-SS-B1
 4300 Cherry Creek Drive South
 Denver, Colorado 80222-1530

APEN # 2 OF 3
 AIRS ID (APCD USE)

EPA8TEP009687

AIR POLLUTANT EMISSION NOTICE

FIRM NAME PUBLIC SERVICE COMPANY OF COLORADO-PAWNEE STATION PERMIT NO. C11674
 MAIL ADDRESS P.O. BOX 840, DENVER, CO 80201-0840 PLANT LOCATION 14940 COUNTY RD. 24, BRUSH, CO COUNTY MORGAN
 PERSON TO CONTACT REGARDING THIS INFORMATION PETER J. COHLMIA TITLE CHIEF ENVIRONMENTAL SCIENTIST PHONE (303) 294-2810
 GENERAL DESCRIPTION OF THIS PLANT'S FUNCTION ELECTRICITY GENERATION FEDERAL TAX I.D. NO. _____

A. GENERAL INFORMATION		Normal Operation of Plant			Process Seasonal Throughput (% of Annual)				ADDITIONAL INFORMATION OR REMARKS:
No. of Employees	Land Area	Hours/Day	Hours/Year	Days/Week	Dec-Feb	Mar-May	Jun-Aug	Sep-Nov	

B. STACK OR VENT INFORMATION (Identify below which stack if plant has two or more; refer to attached sketch of plant layout)									
Height ft	Diameter ft	Temperature °F	Flow Rate ACFM	Velocity ft/min	Moisture %	Plant ID No. for Stack Unit #1			

C. FUEL INFORMATION		Design Rate (10 ⁶ BTU/HR)	Kind of Fuel Burned	Annual Fuel Consumption		Fuel Heating Value: (BTU/lb, BTU/gal, or BTU/SCF)	Per Cent by Weight		Seasonal Fuel Use (% of Annual Use)				Space Htg (% Ann.)
Description of Combustion Unit				Requested level			Sulfur	Ash	Dec-Feb	Mar-May	Jun-Aug	Sep-Nov	
P.C. Boiler			Nat. Gas		180.232 MMCF		0	0					
Make/Model:													
Serial No.													

D. PROCESS INFORMATION		Raw Materials Used	Raw Materials Annual Consumption		Design Rate (Specify Units/Hour)	Finished Product	Finished Product Annual Output	
Description of Processing Unit		Description	Requested level	Data year level		Description	Requested level	Data year level
Make/Model:								
Serial No.:								

E. POLLUTION CONTROL EQUIPMENT			Overall Collection Efficiency	ESTIMATED EMISSIONS (TONS/YEAR) AT THROUGHPUTS REQUESTED ABOVE		ACTUAL EMISSIONS (DATA YEAR)	ESTIMATION METHOD	CHECK ALL BOXES THAT APPLY
Pollutant	Type of Control Equipment			CONTROLLED	UNCONTROLLED			
	Primary	Secondary						<input type="checkbox"/> New or previously unreported source*
Particulate	010		99.2			0.3 ton	AIRS	<input type="checkbox"/> Requesting modification of existing permit†
PM ₁₀	010		97.7			0.3	AIRS	<input checked="" type="checkbox"/> Change in emissions, throughputs or equipment‡
SO ₂	000					0.1	AIRS	<input type="checkbox"/> Transfer of ownership (List previous owner in REMARKS section of box A.)‡
NO _x	000					49.6	AIRS	<input type="checkbox"/> Relocation of Source‡
VOC	000					0.1	AIRS	<input type="checkbox"/> Previous APEN is expiring‡
CO	000					3.6	AIRS	<input type="checkbox"/> Mandatory update or deferred reporting‡
PLEASE USE APCD HAP ADDENDUM FORM TO REPORT HAZARDOUS AIR POLLUTANT EMISSIONS OR OTHER POLLUTANTS NOT LISTED ABOVE.			<input type="checkbox"/> CHECK HERE IF YOU WISH THE DIVISION TO CALCULATE YOUR EMISSIONS. SEE "EMISSION ESTIMATES" INSTRUCTIONS ON BACK.					

Signature of Person Legally Authorized to Supply Data: Peter J. Cohlma DATE: 4/29/94 DATA YEAR (See Instructions on Reverse): 1993
 Typed Name and Title: PETER J. COHLMIA, CHIEF ENVIRONMENTAL SCIENTIST Date source began or will begin operation: _____

THIS NOTICE IS VALID FOR FIVE YEARS. A revised notice shall be filed prior to this expiration date, whenever a permit limitation must be modified, whenever control equipment is changed, and annually whenever a significant emission change occurs. For specific details see Regulation 3, Part A, § II.C.1.
A \$100 FILING FEE IS REQUIRED FOR EACH NOTICE FILED. Mail to: COLORADO DEPARTMENT OF HEALTH
 APCD-SS-B1
 4300 Cherry Creek Drive South
 Denver, Colorado 80231-1520
 For information, call (303)692-3150.
 APEN # 3 OF 3
 AIRS ID (APCD USE)
EP8TEP009688

PLANT SUMMARY CHANGE FORM

CONTROL PERSON: PETER J. COHLMIA

SOURCE ID #: 0870011

TELEPHONE #: 294-2810

NUMBER OF EMPLOYEES: _____

FEDERAL TAX ID #: 84-0296600

PLANT PROPERTY AREA: _____ ACRES

DATA YEAR: 1991

USE THIS FORM TO MAKE CORRECTIONS TO DATA CONTAINED ON THE PLANT SUMMARY FORM. SPECIFIC DETAILS SHOULD ALSO BE CODED ON THE APEN UPDATE FORM.
PLEASE PRINT ALL INFORMATION IN A CLEAR AND LEGIBLE MANNER.

OWNER COMPANY ADDRESS

NAME: PUBLIC SERVICE COMPANY OF COLORADO
ADDRESS: P. O. BOX 840
CITY, STATE: DENVER, CO
ZIP CODE: 80201-0840
TELEPHONE #: (303) 294-2810
FAX #: (303) 294-2829
EMERGENCY #: (303) 571-7511

LOCATION ADDRESS

PAWNEE STATION
14940 COUNTY RD 24 (P.O. BOX 857)
BRUSH, CO
80723
(303) 842-5066
()
()

MAILING ADDRESS

NAME: PETER J. COHLMIA - PUBLIC SERVICE CO.
ADDRESS: P. O. BOX 840
CITY, STATE: DENVER, CO
ZIP CODE: 80201-0840
TELEPHONE #: (303) 294-2810
FAX #: (303) 294-2829
EMERGENCY #: (303) 571-7511

BILLING ADDRESS

PETER J. COHLMIA - PUBLIC SERVICE CO.
P. O. BOX 840
DENVER, CO
80201-0840
(303) 294-2810
(303) 294-2829
()

C 0006161

DEPARTMENT USE ONLY

CODER: _____

SIGNATURE: Peter J. Cohlma

EPA8TEP009689

APEN UPDATE CHANGE FORM
PAWNEE

SOURCE ID #: 0870011

POINT DATA

POINT #	PERMIT #	QUARTERLY THRUPUT (% TO TOTAL 100)	NORMAL OPERATING RATE (HRS DAY WEEK)	BOILER CAPACITY (BTUE6/HR)	SPACE HEAT (% USED)
01		/ / /	/ /		

STACK DATA

HEIGHT (FT)	DIAMETER (FT)	TEMPERATURE (F)	FLOW RATE (CUFT/MIN)	VELOCITY (FT/MIN)	PLUME HEIGHT (FT)

PROCESS DATA

SCC CODE	SEQUENCE #	PROCESS RATE	SCC UNITS	MAXIMUM DESIGN RATE (SCC UNIT/HR)	SULFUR CONTENT (% BY WEIGHT)	ASH CONTENT (% BY WEIGHT)	HEAT CONTENT (BTUE6/SCC UNIT)
10100222		1,986,440	TON		0.31	4.60	17

POLLUTANT DATA

POLLUTANT	CONTROL EQUIPMENT	CONTROL EFFICIENCY (%)	EMISSION FACTOR (LBS/SCC UNIT)	ASH/SULFUR FLAG	EMISSION FACTOR SOURCE	PERMITTED EMISSIONS (TONS/YEAR)	ESTIMATED EMISSIONS (TONS/YEAR)
CO	000	00.0	0.6		C		596
VOC	000	00.0	0.07		C		70
NO _x	025	57.4	21.0		A		8,885
SO ₂	000	00.0	10.44		A		10,369
TSP	010	99.2	10.0	A	C		366
PM10	010	97.7	2.3	A	C		242
LEAD	010	95.0	0.0133		C		1

START-UP DATE: _____

SOURCE DESCRIPTION: No. 1 STEAM GEN - COAL

DEPARTMENT USE ONLY

CODER: _____

ORIGINAL PERMIT ISSUE DATE: _____

SIGNATURE: Ruth J. Cochran

IS THIS A FUGITIVE DUST SOURCE (Y/N): N

DO YOU WISH TO HAVE YOUR PROCESS
INFORMATION HELD CONFIDENTIAL (Y/N): N

C 0006162

APEN UPDATE CHANGE FORM
PAWNEE

SOURCE ID #: 0870011

POINT DATA

POINT #	PERMIT #	QUARTERLY THRUPUT (% TO TOTAL 100)	NORMAL OPERATING RATE (HRS DAY WEEK)	BOILER CAPACITY (BTUE6/HR)	SPACE HEAT (% USED)
NA		/ / /	/ /		

STACK DATA

HEIGHT (FT)	DIAMETER (FT)	TEMPERATURE (F)	FLOW RATE (CUFT/MIN)	VELOCITY (FT/MIN)	PLUME HEIGHT (FT)

PROCESS DATA

SCC CODE	SEQUENCE #	PROCESS RATE	SCC UNITS	MAXIMUM DESIGN RATE (SCC UNIT/HR)	SULFUR CONTENT (% BY WEIGHT)	ASH CONTENT (% BY WEIGHT)	HEAT CONTENT (BTUE6/SCC UNIT)
10100501		156	GALE3		0.30	0.00	137

POLLUTANT DATA

POLLUTANT	CONTROL EQUIPMENT	CONTROL EFFICIENCY (%)	EMISSION FACTOR (LBS/SCC UNIT)	ASH/SULFUR FLAG	EMISSION FACTOR SOURCE	PERMITTED EMISSIONS (TONS/YEAR)	ESTIMATED EMISSIONS (TONS/YEAR)
CO	000	00.0	5.0		C		0
VOC	000	00.0	0.2		C		0
NO _x	000	00.0	24.0		C		2
SO ₂	000	00.0	143.6	S	C		3
TSP	010	99.2	2.0		C		0
PM10	010	97.7	1.0		C		0
LEAD	010	00.0	0.0004		C		0

START-UP DATE: _____

SOURCE DESCRIPTION: No. 1 STEAM GEN - OIL

DEPARTMENT USE ONLY

CODER: _____

ORIGINAL PERMIT ISSUE DATE: _____

SIGNATURE: Rita J. Cochran

IS THIS A FUGITIVE DUST SOURCE (Y/N): N

DO YOU WISH TO HAVE YOUR PROCESS
INFORMATION HELD CONFIDENTIAL (Y/N): N

C 0006163

APEN UPDATE CHANGE FORM
PAWNEE

SOURCE ID #: 0870011

POINT DATA

POINT #	PERMIT #	QUARTERLY THRUPUT (% TO TOTAL 100)	NORMAL OPERATING RATE (HRS DAY WEEK)	BOILER CAPACITY (BTUE6/HR)	SPACE HEAT (% USED)
NA		/ / /	/ / /		

STACK DATA

HEIGHT (FT)	DIAMETER (FT)	TEMPERATURE (F)	FLOW RATE (CUFT/MIN)	VELOCITY (FT/MIN)	PLUME HEIGHT (FT)

PROCESS DATA

SCC CODE	SEQUENCE #	PROCESS RATE	SCC UNITS	MAXIMUM DESIGN RATE (SCC UNIT/HR)	SULFUR CONTENT (% BY WEIGHT)	ASH CONTENT (% BY WEIGHT)	HEAT CONTENT (BTUE6/SCC UNIT)
10100601		58	CFTE6		0.00	0.00	1,071

POLLUTANT DATA

POLLUTANT	CONTROL EQUIPMENT	CONTROL EFFICIENCY (%)	EMISSION FACTOR (LBS/SCC UNIT)	ASH/SULFUR FLAG	EMISSION FACTOR SOURCE	PERMITTED EMISSIONS (TONS/YEAR)	ESTIMATED EMISSIONS (TONS/YEAR)
CO	000	00.0	40.0		G		1
VOC	000	00.0	1.4		G		0
NO _x	000	00.0	550.0		G		16
SO ₂	000	00.0	0.6		G		0
TSP	010	99.2	3.0		G		0
PM10	010	97.7	3.0		G		0
LEAD	010	00.0	0.0		D		0

START-UP DATE: _____

SOURCE DESCRIPTION: No. 1 STEAM GEN - NAT GAS

DEPARTMENT USE ONLY

CODER: _____

ORIGINAL PERMIT ISSUE DATE: _____

SIGNATURE: Robert J. Columbia

IS THIS A FUGITIVE DUST SOURCE (Y/N): N

DO YOU WISH TO HAVE YOUR PROCESS
INFORMATION HELD CONFIDENTIAL (Y/N): N

C 0006164